

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

EDGARDO NICOLAS MARTINEZ PEREZ

Debtors

Case No. 16-05934  
Chapter 13

**URGENT MOTION TO ALTER OR AMEND ORDER NUNC PRO TUNC**

**TO THE HONORABLE COURT:**

**COMES NOW** Debtor, represented by the undersigned law office, respectfully sets forth and prays:

1. On August 6, 2018, Debtor filed two motions requesting authorization to sale a real property with shorter time to object. See, Docket No. 129 and 130.

2. Inadvertently, Debtor did not provide a justification for the request to shorten the time to object to the aforementioned motion.

3. Thereafter, on August 8, 2018, this Honorable Court entered an order denying Debtor's request for shortening the time to object to the sale of real property for failure to give a proper justification. See, Docket No. 130 and 131.

4. The reason why the Debtor requested this Honorable Court to shorten the time to object is because the only thing needed to conclude the transaction to sell the real property is the authorization from the Court.

5. Therefore, the Debtor respectfully request from this Honorable Court, to amend or alter the order nunc pro tunc in order to shorter the time to object to the sale of the real property until August 16, 2018.

6. The sale of this property is in the best interest of Creditors and the Estate.

7. As provided for in Local Bankruptcy Rule 9013(f), undersigned counsel hereby certifies that he:

- (a) has carefully examined the matters set forth herein and has concluded that there is a true need for their disposition on an expedited basis, in as much as the only thing needed to conclude the transaction is the authorization from this Honorable Court;
- (b) has not created the emergency through any lack of due diligence;
- (c) has made a bona fide effort to resolve the matter in as much as this issue has been discussed with the Chapter 13 Trustee and they agreed that the sale of this property is in the best interest of Creditors and the Estate.

**WHEREFORE**, the Debtor respectfully requests from this Honorable Court to grant this Motion and amend or alter the order nunc pro tunc in order to shorten the time to object to the sale of the real property until August 16, 2018, with any further relief that is just and proper.

**CERTIFICATE OF SERVICE:** I hereby certify that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF system, which will send notification, upon information and belief, of such filing to the following: CHAPTER 13 TRUSTEE AND THE UNITED STATES TRUSTEE and to all CM/ECF participants. We also certify that this same date we have mailed by United States Postal Service the document to all creditors and parties in interest as per the attached master address list.

**RESPECTFULLY SUBMITTED**

In San Juan, Puerto Rico this 13<sup>th</sup> day of August, 2018.

/s/ **William Rivera Vélez**  
William Rivera Vélez  
USDC No. 229408  
COSVI Office Complex  
Esq. Ave. Américo Miranda 400  
Edif. Original, Local B  
San Juan, PR 00927  
Tel. (787) 625-1948 / (787) 469-8913  
Fax. 787-625-1949  
E-mail: wrvlaw@gmail.com